EXHIBIT G
DEFENDANTS'
DEPOSITION
DESIGNATIONS

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

Midas Green Technologies, LLC,	)
Plaintiff,	)
v.	) Civil Action No. 6:22–CV–00050–ADA
Rhodium Enterprises, Inc.; Rhodium Technologies LLC;	) )
Rhodium 10MW LLC; Rhodium 2.0 LLC;	) JURY TRIAL DEMANDED
Rhodium 30MW LLC; Rhodium Encore LLC;	)
Rhodium Renewables LLC;	)
Rhodium Renewables Sub LLC; and Rhodium Ready Ventures LLC.	)
Defendants.	)
	)

## **DEFENDANTS' DEPOSITION DESIGNATIONS**

Defendants Rhodium Enterprises, Inc., Rhodium Technologies LLC, Rhodium 10MW LLC, Rhodium 2.0 LLC, Rhodium 30MW LLC, Rhodium Encore LLC, Rhodium Renewables LLC, Rhodium Renewables Sub LLC, and Rhodium Ready Ventures LLC ("Rhodium") disclose the following deposition designations, upon which Rhodium may rely at trial. Rhodium reserves all rights, including but not limited to the rights to (i) supplement or modify these designations, including to account for unintentional omissions or to respond to issues raised by the Court's pretrial or trial rulings or issues raised after the submission of these designations; (ii) to introduce any testimony designated by Plaintiff; and (iii) to propound rebuttal designations.

## **Defendants' Deposition Designations and Plaintiffs' Responses**

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Francisco Conti			
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Mario Conti Garcia			
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David Christopher Laguna			
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	Mike Rainone			
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Scott Sickmiller			
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Kenneth D. Swinden				
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John C. Tribou				
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Thomas R. Turner			
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